1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

In re

|| Nevada Bar No. 5859

NICHOLAS A. KOFFROTH, ESQ.

Nevada Bar No. 16264

FOX ROTHSCHILD LLP

1980 Festival Plaza Drive, Suite 700

Las Vegas, Nevada 89135

Telephone: (702) 262-6899

Facsimile: (702) 597-5503

Email: baxelrod@foxrothschild.com nkoffroth@foxrothschild.com

Counsel for Debtor

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

CASH CLOUD, INC.,
dba COIN CLOUD,

STIPULATION TO FURTHER
CONTINUE HEARING DATE

Debtor.

Old Hearing Date: July 17, 2024 Old Hearing Time: 9:30 a.m.

Case No. BK-23-10423-mkn

New Hearing Date: September 18, 2024

New Hearing Time: 9:30 a.m.

Brink's Incorporated ("<u>Brink's</u>"), by and through its counsel Hirschler Fleischer, P.C., and Cash Cloud, Inc. dba Coin Cloud (the "<u>Debtor</u>" and together with Brink's, the "<u>Parties</u>"), debtor and debtor in possession in the above-captioned case (the "<u>Chapter 11 Case</u>"), by and through its counsel Fox Rothschild LLP, stipulate and agree as follows (the "Stipulation"):

RECITALS

A. WHEREAS, on July 28, 2023 Brink's, by counsel, filed its *Application for Allowance and Payment of Administrative Expense Claim of Brink's Incorporated* (the "Application") (Docket No. 977), which asserted and requested allowance and payment of Brink's Administrative Claim (Docket No. 890) (the "Claim") in the amount of \$804,487.64, which was filed on July 20, 2023

26

27

28

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

pursuant to the Order Establishing Administrative Claim Bar Date for Filing Proofs of Administrative
Expense Claim and Approving Form, Manner, and Sufficiency of Notice Thereof (Docket No. 823
(the " <u>Order</u> ");

- B. WHEREAS, on August 1, 2023, the Debtor filed its Objection to the Application [ECF No. 989];
- C. WHEREAS, on September 8, 2023, Brink's filed a Notice of Hearing on the Application (the "Hearing") which set the Hearing on October 19, 2023 at 10:30 a.m. and set Brink's reply deadline (the "Reply Deadline") for October 12, 2023 [ECF No. 1181] (the "Notice");
- D. WHEREAS, on October 12, 2023, the Parties filed a Stipulation to Continue the Hearing to November 1, 2023 at 9:30 a.m. (Pacific Time) and to continue the Brink's Reply Deadline to October 25, 2023 (the "Stipulation") [ECF No. 1373];
- E. WHEREAS, on October 16, 2023, the Bankruptcy Court entered an Order approving the Stipulation [ECF No. 1380];
- F. WHEREAS, Brink's timely filed its Reply on October 25, 2023, in which it amended the amount of the Claim to \$966,151.96 [ECF No. 1432];
- G. WHEREAS, on October 30, 2023, the Parties filed a Stipulation to Continue the Hearing to December 13, 2023 at 9:30 a.m. (Pacific Time) (the "Second Stipulation") [ECF No. 1452];
- H. WHEREAS, on November 1, 2023, the Bankruptcy Court entered an Order approving the Second Stipulation [ECF No. 1453];
- I. WHEREAS, on December 11, 2023, the Parties filed a Stipulation to Continue the Hearing to January 17, 2024 at 9:30 a.m. (Pacific Time) (the "Third Stipulation") [ECF No. 1538];
- J. WHEREAS, on December 12, 2023, the Bankruptcy Court entered an Order approving the Third Stipulation [ECF No. 1540];
- K. WHEREAS, on January 15, 2024, the Parties filed a Stipulation to Further Continue the Hearing to March 20, 2024 at 9:30 a.m. (Pacific Time) (the "Fourth Stipulation") [ECF No. 1572];
- WHEREAS, on January 26, 2024, the Bankruptcy Court entered an Order approving L. the Fourth Stipulation [ECF No. 1590];

1

2

3

4

5

6

7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

M.	WHEREAS, on March 18, 2024, the Parties filed a Stipulation to Further Continue the
Hearing to Ma	y 15, 2024 at 9:30 a.m. (Pacific Time) (the "Fifth Stipulation") [ECF No. 1653];

- N. WHEREAS, on March 19, 2024, the Bankruptcy Court entered an Order approving the Fifth Stipulation [ECF No. 1654];
- O. WHEREAS, on May 6, 2024, the Parties filed a Stipulation to Further Continue the Hearing to July 17, 2024 at 9:30 a.m. (Pacific Time) (the "Sixth Stipulation") [ECF No. 1708];
- P. WHEREAS, on May 13, 2024, the Bankruptcy Court entered an Order approving the Sixth Stipulation [ECF No. 1718];
- Q. WHEREAS, the Parties desire to further continue the Hearing to September 18, 2024 at 9:30 a.m. (Pacific Time).

NOW, THEREFORE, the Parties hereby stipulate and agree to the following:

IT IS STIPULATED AND AGREED that:

1. The Hearing shall be continued to September 18, 2024 at 9:30 a.m. (Pacific Time). Dated this 10th day of July 2024.

FOX ROTHSCHILD LLP

Counsel for Debtor

By: /s/ Brett A. Axelrod BRETT A. AXELROD, ESQ. Nevada Bar No. 5859 NICHOLAS A. KOFFROTH, ESQ. Nevada Bar No. 16264 1980 Festival Plaza Drive, Suite 700 Las Vegas, Nevada 89135

HIRSCHLER FLEISCHER, P.C.

By: /s/ Robert S. Westermann

ROBERT S. WESTERMANN, ESQ.
(admitted pro hac vice)
BRITTANY B. FALABELLA
(admitted pro hac vice)
2100 East Cary Street
Richmond, Virginia 23223

and

MAURICE B. VERSTANDIG, ESQ. Nevada Bar No. 15346 THE VERSTANDIG LAW FIRM, LLC 452 W. Horizon Ridge Pkwy, #665 Henderson, Nevada 89012 Counsel for Brink's